

12/20/21

DCP:DGR
F. #2017R00959

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

RUSLAN MIRVIS,

Defendant.

----- X

SUPERSEDING
INFORMATION

Cr. No. 17-273 (S-1)
(T. 18, U.S.C., §§ 2422(b), 2428(a) and
3551 et seq.; T. 21, U.S.C., § 853(p))

U.S.
DISTRICT
COURT
EASTERN
DISTRICT
OF
NEW
YORK
BROOKLYN
OFFICE

THE UNITED STATES ATTORNEY CHARGES:

COERCION AND ENTICEMENT OF A MINOR
TO ENGAGE IN ILLEGAL SEXUAL ACTIVITY

1. In or about and between March 2017 and April 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RUSLAN MIRVIS, using one or more facilities and means of interstate and foreign commerce, to wit: the Internet and mobile Internet applications, did knowingly and intentionally persuade, induce, entice and coerce an individual who had not attained the age of 18 years, to wit: Jane Doe, an individual whose identity is known to the United States Attorney, to engage in sexual activity for which a person could be charged with a criminal offense, to wit: promoting a sexual performance by a child, in violation of New York State Penal Law Section 263.15.

(Title 18, United States Code, Sections 2422(b) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with

Title 18, United States Code, Section 2428(a), which requires the forfeiture of: (a) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2428(a); Title 21, United States Code, Section 853(p))



BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. 17-CR-273 (S-1) (FB)

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

RUSLAN MIRVIS,

Defendant.

SUPERSEDING INFORMATION

(T. 18, U.S.C., §§ 2422(b), 2428(a) and 3551 et seq.; T. 21, U.S.C.,
§ 853(p))

A true bill.

Foreperson

Filed in open court this ----- *day,*

of ----- *A.D. 20* -----

Clerk

Bail, \$ -----

Drew G. Rolle, Assistant U.S. Attorney (718) 254-6783